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Attorney for Plaintiffs
HAWAIIAN ART NETWORK, LLC and
VINCENT K. TYLOR

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

| HAWAIIAN ART NETWORK, LLC |) CIVIL NO. 11-00/22 JMS/KSC |
|---------------------------------|------------------------------|
| and VINCENT K. TYLOR, | (Copyright Infringement) |
| , |) |
| Plaintiffs, |) PLAINTIFFS' MOTION FOR |
| |) DEFAULT JUDGMENT AGAINST |
| VS. |) DEFENDANT ALOHA PLASTIC |
| | SURGERY, LLC.; MEMORANDUM |
| ALOHA PLASTIC SURGERY, LLC; |) IN SUPPORT OF MOTION; |
| JOHN DOES 1-10; JANE DOES 1-10; |) DECLARATION OF GLEN |
| DOE CORPORATIONS 1-10; DOE |) CARNER; DECLARATION OF |
| PARTNERSHIPS 1-10; and DOE |) COUNSEL; EXHIBITS A-B; |
| ASSOCIATIONS 1-10, |) CERTIFICATE OF SERVICE |
| , |) |
| Defendants. |) HEARING: |
| |) Date: |
| |) Time: |
| |) Judge: Hon. Kevin S. Chang |
| |) |
| | ,) |
| | , |

PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANT ALOHA PLASTIC SURGERY, LLC.

Come now Plaintiffs HAWAIIAN ART NETWORK and VINCENT K. TYLOR, by and through counsel, and hereby respectfully move that this Court enter a default judgment in Plaintiffs' favor for the relief demanded in their Complaint filed on December 1, 2011 ('the Complaint'') pursuant to Fed. R. Civ. P. 55(b)(2) on the grounds that Defendant has failed to answer or otherwise defend the Complaint, and Plaintiffs are entitled to judgment as a matter of law against Defendant. Plaintiff seeks judgment against Defendant ALOHA PLASTIC SURGERY, LLC. in the amount of \$34,274.00, plus reasonable attorneys fees and costs in the amount of \$6,780.00 plus Hawaii State taxes of \$319.47 plus costs of \$440.10. This motion is based upon the memorandum in support, the Declaration of Glen Carner, the Declaration of Counsel, Exhibits A and B the and the pleadings and record herein.

DATED: Honolulu, Hawaii, March 24, 2012.

/s/ J. Stephen Street

J. STEPHEN STREET, AAL
Attorney for Plaintiffs
HAWAIIAN ART NETWORK, LLC
and VINCENT K. TYLOR

Hawaiian Art Network, LLC and Vincent K. Tylor, v. Aloha Plastic Surgery, LLC, et al., CV11-00722 JMS/KSC